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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation headquartered in California,

Defendant.

Case No. 3:20-cv-08570-JD

**META PLATFORMS, INC.'S
SUPPLEMENTAL ADMINISTRATIVE
MOTION TO SEAL MATERIALS
SUBMITTED IN CONNECTION WITH
CLASS CERTIFICATION AND
DAUBERT BRIEFING**

Judge: Hon. James Donato

On November 21, 2023, the the parties filed an omnibus motion to seal certain portions of the parties' class certification and *Daubert* briefing. *See* Dkts. 711, 712, 713. The proposed order submitted in connection with the omnibus motion to seal inadvertently omitted twelve of Meta's sealing requests.

Meta respectfully requests to supplement the sealing requests contained in the omnibus motion to seal with these twelve additional sealing requests listed below, which are narrowly tailored, relate to Meta's non-public, confidential data regarding user behavior, *see* Dkt. 711 at 9-11, and contain substantially the same information that Meta seeks to seal elsewhere in the class certification and *Daubert* briefing, *see* Dkt. 711-36 at 17, 25, 28.

Vanderslice Decl. (Dkt. 711-3) Exhibit	Portion of Document Sought to Be Sealed
First Administrative Motion to File Under Seal Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel (Dkt. No. 645)	
Exhibit O1	7:7, percentage
Expert Report of Nicholas Economides, filed at Dkt. Nos. 645-5, 651-4 (Ex. 1), 652-3 (Ex. 1), 663-2 (Ex. 1), 669-7 (Ex. 6)	
Exhibit I	¶ 68, percentage listed in the second sentence
Exhibit I	¶ 320, percentages listed in first and second sentences
Exhibit I	¶ 368, percentage listed in the last sentence
Reply Report of Nicholas Economides, filed at Dkt Nos. 645-6, 651-5 (Ex. 2), 652-4 (Ex. 2), 663-5 (Ex. 4), 669-14 (Ex. 13)	
Exhibit J	¶ 23, percentages and fraction listed in second sentence of (3)
Exhibit J	¶ 53, percentage and fraction listed in last sentence
Exhibit J	¶ 54, percentages
Exhibit J	n. 107, percentages
Exhibit J	¶ 186, percentages
Exhibit J	n. 329, percentages
Reply Report of Sarah Lamdan, filed at Dkt. Nos. 645-11	
Exhibit K	¶ 107, percentage
Transcript of User Plaintiffs' Deposition of Catherine Tucker, filed in full at Dkt. No. 645-15 (Ex. 75), and excerpts thereof filed at Dkt. No. 673-9 (Ex. 13)	

Vanderslice Decl. (Dkt. 711-3) Exhibit	Portion of Document Sought to Be Sealed
Exhibit M	205:21, percentage

These sealing requests are supported by the Declaration of Amrish Acharya, Dkt. 711-1, Rows 71 and 161. Plaintiffs take no position on this motion. Vanderslice Decl. ¶¶ 3-4. The parties continue to take no position on any other party's sealing requests.

1 DATED: December 1, 2023

Respectfully submitted,

2 By: /s/ Sonal N. Mehta

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